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U.S. DISTRICT COURT
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DISTRICT OF UTAH
BY: _____
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TODD LOURENS LEEFLANG,

Defendant.

INDICTMENT

VIO: 18 U.S.C. § 2422(b),
Coercion and Enticement For Illegal
Sexual Activity; and 18 U.S.C. § 2428,
Criminal Forfeiture.

The Grand Jury charges:

Case: 2:08-cr-00748
Assigned To : Stewart, Ted
Assign. Date : 11/5/2008
Description: USA v.

COUNT I
(18 U.S.C. § 2422(b))

On or about October 23, 2008, in the Central Division of the District
of Utah,

TODD LOURENS LEEFLANG,

the defendant herein, did knowingly and intentionally, by means of a facility of interstate

commerce, persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to so persuade, induce, entice, and coerce; all in violation of Title 18, United States Code, Section 2422(b).

NOTICE OF INTENT TO SEEK FORFEITURE

As a result of committing the felony offense alleged in Count I of this Indictment, which is punishable by imprisonment for more than one year, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428 for Count I any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said felony offense and any and all property, real and personal, used or intended to be used in any manner or part to commit and to facilitate the commission of the violation of Title 18, United States Code, Section 2422(b) and any property traceable thereto; including but not limited to: a Dell Studio laptop computer (serial number 34218930133).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney



MARK K. VINCENT
Assistant United States Attorney